

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

FILED
DEC 18 2004
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
JAP

UNITED STATES OF AMERICA,

Plaintiff,

VS.

CASE NO. 00-6273-CR-HUCK

ANTHONY BANKS,

Defendant.

_____ /

DEFENDANT'S UNOPPOSED MOTION FOR PERMISSION OF TRAVEL

COMES NOW, the Defendant, ANTHONY BANKS, by and through his undersigned counsel, and respectfully requests this Honorable Court enter an Order granting him permission to travel. As grounds therefore, it is respectfully submitted:

1. Defendant is in the Home Confinement Electronic Monitoring Program for 120 days at the Last House Recovery Program. Mr. Banks expected completion date is January 28, 2005.
2. Defendant's father resides and operates a clothing shop (i.e., a self-proprietor) in Tavernier, Florida. The Banks family will be spending Christmas in Tavernier, Florida. This includes the Defendant's two (2) sisters, aunts, uncles, and cousins. Defendant seeks permission to travel, on Christmas Day, between the hours of 7:00 a.m. until 9:00 p.m., Mr. Banks would leave Miami at 7:00 a.m. traveling to Tavernier and would return to the Last House Recovery by 9:00 p.m.

WBB
/x

3. If granted permission to travel, the Defendant would be at his father's house located at 130 Coral Avenue, Tavernier, Florida 33070; 1-(305) 852-5140.


4. Assistant United States Attorney Jeffrey Sloman and Albin Fritz Calixte, U.S. Probation Officer, have no opposition/objection to the granting of this motion.

WHEREFORE, the Defendant, ANTHONY BANKS, respectfully requests that this Honorable Court enter an Order permitting him to travel as stated above during the time period set forth in this Motion.

Respectfully submitted,

MANUEL GONZALEZ, JR., ESQ.
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Suite 1170
Coral Gables, Florida 33134
(305) 444-1400
(305) 443-0903 (fax)

BY:


MANUEL GONZALEZ, JR., ESQ.
FLORIDA BAR NO. 397997

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent by U.S. Mail, this 16th day of December 2004, to Jeffrey Sloman, AUSA, 99 N.E. 4TH Street, Miami, Florida 33132-2111, Albin Fritz Calixte, U.S. Probation Officer, 14601 Oak Lane, Miami Lakes, Florida 33016, and Thomas Daniels, The Last House Recovery Program, 1960 South Glades Drive, North Miami Beach, Florida 33162.

BY:


MANUEL GONZALEZ, JR., ESQ.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

VS.

CASE NO. 00-6273-CR-HUCK

ANTHONY BANKS,

Defendant.

_____ /

ORDER GRANTING PERMISSION OF TRAVEL

THIS CAUSE came before the Court on Defendant BANKS' Unopposed Motion for Permission to Travel. After considering said motion and being duly advised, it is hereby

ORDERED AND ADJUDGED that said motion be granted. The Defendant is permitted to travel to Tavernier, Florida, on Christmas Day, December 25, 2004, between the hours of 7:00 a.m. and 9:00 p.m. Defendant must return to the Last House Recovery Program by 9:00 p.m. on December 25, 2004.

DONE AND ORDERED this _____ day of December, 2004.

PAUL C. HUCK
UNITED STATES DISTRICT JUDGE

Copies to:
Jeffrey Sloman, AUSA
Albin Fritz Calixte, U.S. Probation Officer
Manuel Gonzalez, Jr., Esq.